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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARTA ALONSO-DIAZ, individually; DENNY)	
SUAREZ, individually; and OMAR GONZALEZ,)	CASE NO. 2:16-cv-01737-JAD-GWF
individually,)	
)	
Plaintiffs,)	<u>ERRATA TO STIPULATED DISCOVERY</u>
vs.)	<u>PLAN AND SCHEDULING ORDER</u>
)	<u>SUBMITTED IN COMPLIANCE WITH LR</u>
SUPERIOR ELECTRICAL, MECHANICAL &)	<u>26-1(b)</u>
PLUMBING INC., a domestic corporation, DOES I-))	
X, and ROE CORPORATIONS I-X, inclusive,)	<u>SPECIAL SCHEDULING REVIEW</u>
)	<u>REQUESTED</u>
Defendants.)	
)	(corrected items appear in bold print)

Pursuant to Local Rules 26-1(b), the parties respectfully submit the following revised stipulated discovery plan and jointly request that the Court: 1) approve this plan, and 2) implement the plan as a scheduling order. The FRCP 26(f) conference was held on September 9, 2016.

1. Subjects of Discovery

Discovery shall be conducted within the scope and limitations of Fed. R. Civ. P. 26(b).

2. Discovery Cut-Off Date

Defendant Superior Electrical, Mechanical & plumbing Inc. answered the Complaint and asserted a counter-claim against Plaintiffs on July 29, 2013. Plaintiffs/Counter-Defendants answered the counter-claim on August 19, 2016.

1 The parties request additional time in the amount of 180 days beyond the 180 days allowed
2 for under the Federal Rules of Civil Procedure. The reason why additional time is needed and
3 special discovery scheduling warranted is due to the following: The three Plaintiffs each allege that
4 they sustained substantial injury due to Defendant's alleged negligence. The three Plaintiffs in this
5 matter are still treating extensively for the injuries sustained in the subject motor vehicle accident.
6 Additionally, the exact nature of Plaintiffs' injuries and their treatment status is unstable at this
7 time. Moreover, given the number of parties, the potential need to add the driver/employee of
8 Defendant once his or her identity becomes known, the number of medical expert depositions that
9 will likely need to be taken as well as depositions of any retained experts, the voluminous amount
10 of medical records and billing that will need to be produced and reviewed, and discovery necessary
11 on Defendant/Counter Plaintiffs' counter-claims, the parties would not be able to realistically
12 complete all of the discovery necessary in 180 days.

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15 In short, the parties request the additional 180 days now to avoid having to inevitably move
16 this Court for time in the near future. This request for additional time is not meant for the purposes
17 of delay or with any dilatory motive. Therefore, discovery shall close on August 2, 2017.

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19 3. **Amendment of Pleadings and Adding Parties**

20 Motions to amend pleadings and add parties shall be filed no later than ninety (90) days
21 before the close of discovery: May 23, 2017.

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23 4. **Expert Disclosures**

24 Expert disclosures shall be due no later than sixty (60) days before the close of discovery:
25 June 22, 2017. Rebuttal disclosures shall be due no later than thirty (30) days before the close of
26 discovery: July 21, 2017.

1 5. **Interim Status Report**

2 The Interim Status Report referenced in LR 26-3 shall be filed no later than sixty (60) days
3 before the expiration of the discovery period: June 22, 2017.
4

5 6. **Dispositive Motions**

6 The deadline for filing dispositive motions shall be thirty (30) days after the close of
7 discovery: September 20, 2017.

8 7. **Joint Pre-Trial Order**

9 The Joint Pre-Trial Order referenced in LR 26-1 (e)(5) shall be filed no later than thirty (30)
10 days after the date set for filing dispositive motions: October 20, 2017. However, in the event that
11 dispositive motions are filed, the date for filing a Joint Pre-Trial Order shall be suspended until
12 thirty (30) days after a decision is rendered by the Court regarding the dispositive motions, or upon
13 further order of the Court.
14

15 THE POWELL LAW FIRM

15 HARPER LAW GROUP

16 /s/ Michael A. Kristof

16 /s/ Taylor Selim

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23
24 IT IS SO ORDERED:

25 
26 _____
27 UNITED STATES MAGISTRATE JUDGE
28

DATED: 9/21/2016
